From: Hashimoto, Janet
To: Sablad, Elizabeth; Smith, DavidW
Subject: FW: Regional Monitoring Language in SIWWTP and CCH MS4
Date: Friday, August 22, 2014 11:37:00 AM
Attachments: image001.png

Here is the email I sent to Darryl after he asked me to take a look at the language. Janet

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From: Hashimoto, Janet
Sent: Monday, August 11, 2014 12:57 PM
To: 'Lum, Darryl C'
Cc: alec.wong@doh.hawaii.gov; Roser, Sara
Subject: RE: Regional Monitoring Language in SIWWTP and CCH MS4

Hi Darryl: Finally had a chance to focus on this. Had to get out a few TMDL and 303(d) list approvals. Been busy because it's getting close to the end of our FY, so things are coming in.

The older language in cyan sounds like the one we developed several years ago, back in my 301(h) days. It was intended to capture the spirit of regional monitoring, before we had the specifics worked out. I think it's generic, but could continue to work. However, I can see having more specifics might be good.

In your revisions in yellow, you are trying to get more prescriptive in asking for a lot of specifics from the discharger. One problem with this is that if this is intended to be in each separate NPDES permit, you are asking each one to come up with different monitoring programs. The idea behind regional monitoring is that each permittee is a participant in the overall monitoring design and program that works for everyone and is designed for a waterbody. I'm not sure that you want different information for a-g from each permittee. One overall plan for each unique waterbody (or population of interest) should be developed by the expected permittees/participants to regional monitoring.

Did you have your discussion with CCH yet? If you did and they seemed to be interested and willing, then maybe we should just try to work with them to come up with a suggested regional plan and design. EPA is willing to assist, and we could use the national coastal monitoring survey (and Hawaii's probabilistic survey) as the basis for the re-design. We want to design something where we can fit the multiple purposes of our other monitoring programs in a cooperative partnership to serve all of our monitoring needs. We may want to lower our regulatory hammer for this effort. Would be interested in hearing CCH's thoughts if you had discussion with them. Let me know.

We can discuss further. Also, since CCH is a member of NACWA, we may be able to foster cooperation by having other southern CA NACWA members that have been doing regional monitoring talk with CCH. Perhaps hearing successes from other POTWs would help get this going again in Hawaii.

Janet

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From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]
Sent: Friday, August 01, 2014 2:20 PM
To: Hashimoto, Janet
Cc: alec.wong@doh.hawaii.gov
Subject: RE: Regional Monitoring Language in SIWWTP and CCH MS4

Hi Janet,

Below is a rough draft of the proposed regional monitoring language for the Sand Island WWTP permit. We were thinking of changing the regional monitoring so that the data collection can be used for future integrated report data, listing/delisting, future 11-54 revisions, permit assimilative capacity assessments, identification of pollutant sources, etc. Our thinking was that if this works in Mamala Bay, we can require this in all major NPDES permits for all waterbodies.

Please let me know if you think this is ok or if we should stick with the existing language. (Existing regional monitoring language is below in cyan highlight.)

Thanks,
Darryl

Proposed Language for Sand Island WWTP In Special Conditions Section (Language Needs to be Modified for CCH MS4 Permit)

Regional Monitoring Activities Coordination and Implementation

The intent of regional monitoring activities is to assess whether the entire receiving water body meets Water Quality Standards and to determine any sources that may

be causing or contributing to a non-compliance with Water Quality Standards. Regional monitoring activities are meant to maximize the efforts of all monitoring partners using a more cost-effective monitoring design and to best utilize the pooled scientific resources of the region. During these coordinated sampling efforts, the Permittee's receiving water sampling and analytical effort will be reallocated to provide a regional assessment of the impact of the discharge. Anticipated modifications to the monitoring program will be coordinated so as to provide a more comprehensive picture of the ecological and statistical significance of monitoring results and to determine cumulative impacts of various pollution sources. The Permittee is required to:

a. Identify the designated uses and existing uses of the receiving water.
b. Identify the issue(s) or condition(s) that will help them to determine if the water quality required to meet the designated uses of the receiving water are being attained and the sources that may be contributing to a lack of attainment.
c. Specify the parameters that will be measured, detection limits, action levels, instruments/measuring devices, references, calibration procedures, precision, and accuracy.
d. Identify the spatial and temporal boundaries of the study. The decision unit(s) shall include the entire water column throughout the entire receiving State water.
e. State the decision rules that incorporate the parameters of interest, the decision units, and the action levels. At a minimum, decision units are required at all conceivable inputs into the receiving water.
f. Specify the performance or acceptance criteria for all parameters being measured.
g. Develop the plan for obtaining data.
h. Identify all organizations, stakeholders, and interested parties that will participate in this study. All Major NPDES Permit holders discharging into the receiving waters shall be asked to participate.
i. Coordinate, organize, and facilitate the implementation of the regional monitoring activities with all Major NPDES Permit holders that are discharging into their receiving waters, EPA, DOH, and other participating government agencies and private entities.
j. Develop and submit to DOH the detailed plan for regional monitoring in the receiving waters within 2 years from the issuance date of this permit. The final plan must be acceptable to EPA and DOH prior to its implementation. If an acceptable plan is not submitted within 2 years from the issuance date of this permit, DOH will provide the plan that the Permittee must implement. DOH will provide this plan to the Permittee within 2.5 years from the issuance date of this permit.
k. Initiate implementation of the EPA/DOH accepted regional monitoring activities plan within 2.75 years from the issuance date of this permit. Regional monitoring activities and data collection must be performed for at least 1 year to account for seasonal variation.
l. Complete and submit a final regional monitoring activities report detailing all of the requirements, findings, and conclusions to the DOH within 4.5 years from the issuance date of this permit.

All components of the regional monitoring activities are subject to DOH and EPA acceptance.

Previous Regional Monitoring Language in Current Sand Island and Fort Kam Permits

As directed by DOH, the Permittee shall participate in regional monitoring activities conducted in the Mamala Bay during the term of this permit. The intent of regional monitoring activities is to maximize the efforts of all monitoring partners using a cost-effective monitoring design and to best utilize the pooled scientific resources of the region. The detailed plan for regional monitoring in Mamala Bay shall be designed by the regional dischargers, in conjunction with the EPA, Department, City and County of Honolulu, and as much as possible, other participating government agencies and private entities. The final monitoring plan must be approved by DOH prior to its implementation.

During these coordinated monitoring efforts, the Permittee's sampling and analytical effort as required under Part C.2 and Part C.3 of this permit, may be reallocated or modified to provide a regional characterization of the water quality within Mamala Bay and evaluate the impact of wastewater discharges to the Mamala Bay. Anticipated modifications to the monitoring program will be coordinated so as to provide a comprehensive picture of the ecological and statistical significance of monitoring results and to determine cumulative impacts of various pollutant sources. If predictable relationships among the biological, water quality and effluent monitoring variables can be demonstrated, it may be appropriate to decrease the Permittee's monitoring effort. Conversely, the monitoring program may be intensified if determined necessary to fully characterize the receiving water and evaluate the impacts of wastewater on the receiving water. Changes made under this section will improve the overall effectiveness of monitoring in the Mamala Bay. Accordingly, minor changes may be made without further public notice.